

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

CASE NO: 24-CR-20295-JB

Plaintiff,

vs.

BRYAN TOCHON-LOPEZ,
WILMER MOISES BARSELO,
JOSE FELICIANO LEMOS,
JESUS RODRIGUEZ,
LUIS ANDRES ZUNIAGA,
JORGE LUIS LOPEZ-ASTUDILLO,
EULIDES OLIVEROS-LUGO,
STIVEN JOSE FLORES

Defendants.

UNOPPOSED JOINT MOTION FOR CONTINUANCE OF TRIAL

Defendants, **BRAYAN TOCHON-LOPEZ, WILMER MOISES BARSELO, JOSE FELICIANO LEMOS, JESUS RODRIGUEZ, LUIS ANDRES ZUNIAGA, JORGE LUIS LOPEZ-ASTUDILLO, EULIDES OLIVEROS-LUGO, and STIVEN JOSE FLORES**, by and through their counsel, and in accordance with *18 U.S.C. §3161(h)(7)* and *S.D. Fla. L.R. 7.6*, hereby file this Unopposed Joint Motion for Continuance of the currently set trial date. As grounds in support of this request, the Defendants state:

1. On or about June 26, 2024, the Defendants were interdicted by the United States Coast Guard.
2. On July 11th, 2024, the Government filed an indictment charging the Defendants with Conspiracy to Possess with Intent to Distribute a Controlled Substance While on Board a Vessel Subject to the Jurisdiction of the United States (Count 1) and Possession with Intent to Distribute a Controlled Substance While On Board a Vessel Subject to the Jurisdiction of the United States.

3. On July 22nd, 2024, the Defendants were arraigned in this matter [DE 15, 16, 17, 18, 19, 20, 21, 22].

4. On or about July 22, 2024, the Government provided discovery to Defendants.

5. On February 12, 2025, Defendants filed a Joint Motion to Dismiss. [DE 71]. On or about February 26th, 2025, the Government filed its Response to the Defendants' Joint Motion to Dismiss. [DE 77]. On or about March 5th, 2025, the Defendants filed their Reply to the Government's Response. [DE 82].

6. On or about February 25th, 2025, this Honorable Court referred the Defendants' Joint Motion to Dismiss to the Honorable Magistrate Edwin G. Torres. [DE 76]. On April 4th, 2025, Magistrate Torres entered a Report and Recommendation recommending that the Defendants' Joint Motion to Dismiss be denied. [DE 86]. On April 18th, the Defendants filed Joint Objections to the Report and Recommendation filed by Magistrate Torres. [DE 89].

7. On July 16, 2025, this Honorable Court entered its Order affirming and adopting United States Magistrate Judge Torres' Report and Recommendation [DE 89] and denying the Defendants' Joint Motion to Dismiss [DE 71]. *See* [DE 107].

8. A jury trial on this matter is set for the two-week period commencing July 28, 2025, with a Calendar Call scheduled for July 22, 2025. [DE 101].

9. Defendants request a continuance of the trial date to afford the Parties an opportunity to resolve this matter without the need for a trial.

10. This Motion is being filed in good faith, in the interests of judicial economy, and in furtherance of providing Defendants effective assistance of counsel. This Motion is not being filed for purposes of undue delay.

CERTIFICATE OF CONFERRAL PURSUANT TO LOCAL RULE 88.9

On July 15th, 2025, the undersigned conferred with AUSA Yvonne Rodriguez-Schack who advised that the Government does not object to the Court granting this Motion for Continuance. Additionally, after conferral with counsel for the codefendants, the codefendants join in the motion.

WHEREFORE, Defendants, **BRAYAN TOCHON-LOPEZ, WILMER MOISES BARSELO, JOSE FELICIANO LEMOS, JESUS RODRIGUEZ, LUIS ANDRES ZUNIAGA, JORGE LUIS LOPEZ-ASTUDILLO, EULIDES OLIVEROS-LUGO,** and **STIVEN JOSE FLORES,** respectfully pray that this Honorable Court grant the Defendants' Joint Motion for Continuance of trial, enter an Order continuing this case so that the Defendants' Joint Motion to Dismiss and their Objections to the Magistrate's Report and Recommendation are finally disposed of, and for any other relief the Court deems proper and just under the circumstances.

Respectfully submitted,

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<p>ROGER CABRERA, PA <i>Attorney for Jesus Rodriguez</i></p> <p>BY: <u>/s/Roger DE Jesus Cabrera</u> Roger DE Jesus Cabrera Florida Bar No.: 148740 333 SE 2nd Avenue, Suite 2000 Miami, Florida 33131 Tel: (305) 823-8383 Fax: (305) 675-7970 Email: Roger@Cabrera.legal</p>	<p>LAW OFFICES OF JOSEPH A. CHAMBROT <i>Attorney for Luis Andres Zuniaga</i></p> <p>BY: <u>/s/Joseph Abraham Chambrot</u> Joseph Abraham Chambrot Florida Bar No.: 434566 1885 NW North River Drive Miami, Florida 33125 Tel: (305) 547-2101 Fax: (305) 547-2107 Email: joseph@chambrotlaw.com</p>
<p>BATISTA & BATISTA <i>Attorney for Eulides Oliveros-Lugo</i></p> <p>BY: <u>/s/Jose Rafael Esteban Batista</u> Jose Rafael Esteban Batista Florida Bar No.: 317251 7171 Coral Way, Suite 400 Miami, Florida 33155 Tel: (305) 267-5139 Fax: (305) 267-4108 Email: jrebatistalaw@gmail.com</p>	<p>CARAMES LAW <i>Attorney for Stiven Jose Flores</i></p> <p>BY: <u>/s/Dianne Elizabeth Carames</u> Dianne Elizabeth Carames Florida Bar No.: 68419 10 Canal Street, Suite 328 Miami Springs, Florida 33136 Tel: (305) 403-8063 Fax (305) 379-6668 Email: dianne@puglisicarames.com</p>

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was electronically filed via *CM/ECF* this 16th day of July 2025, and a courtesy copy of the foregoing furnished via email to all counsel of record.

BY: /s/ Frank Quintero, Jr.
FRANK QUINTERO, JR.
Fla. Bar 399167